

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 2875  
Civil No. 19-02875 (RBK/JS)**

This Document relates to All Actions  
Represented by Justin R. Parafinczuk,  
of Parafinczuk Wolf, PA

**PLAINTIFFS' NOTICE OF SERVING EXPERT REPORT ADDRESSING GENERAL  
CAUSATION AND AVAILABILITY FOR DEPOSITION  
OF STEVEN B. BIRD, M.D.**

COMES NOW, Plaintiffs represented by undersigned counsel, and hereby file their  
Notice of Serving Expert Report Addressing General Causation and Availability for Deposition  
of Steven B. Bird, M.D., pursuant to Fed. R. Civ. P 26, and Case Management Order 23.

Dated: July 2, 2021

Respectfully submitted,

By: /s/Justin R. Parafinczuk  
Justin R. Parafinczuk, Esq.  
Florida Board Certified Civil Trial Attorney  
*Counsel for Certain Plaintiffs*

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